

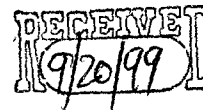


Shaklee Corporation
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0750 '99 OCT 15 P2:05

September 8, 1999



Office of Special Nutritionals (HFS-450)
Center for Food Safety and Applied Nutrition
Food and Drug Administration
200 C Street, S.W.
Washington, DC 20204

SECTION 403(r)(6) NOTIFICATION

Dear Sir or Madam:

In accordance with the requirements of Section 403(r)(6) of the Federal Food, Drug and Cosmetic Act, Shaklee Corporation notifies FDA that it has begun using the following statements:

- Helps promote cardiovascular health
- Vitamin E, selenium and grapeseed extract deliver potent antioxidant protection from free radical cell damage.
- Grapeseed extract is a valuable phytonutrient containing proanthocyanidins, compounds shown in recent studies to have extremely potent antioxidant properties. This complements the antioxidant properties of vitamin E which help to prevent free radical damage caused by environmental factors, normal cellular functions and poor diet.
- These compounds [proanthocyanidins] complement the antioxidant activity of vitamin E to help promote cardiovascular health.
- Recent studies show gamma tocopherol to be an even more potent antioxidant than d-alpha tocopherol.
- Recent studies show d-alpha tocopherol may have very potent antioxidant properties that promote the health of the heart as well as the immune system.
- Shaklee Vita-E contains naturally occurring d-alpha tocopherol that is more biologically active and delivers more effective antioxidant protection than synthetic vitamin E.

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Shaklee Corporation

- In laboratory studies, the antioxidant properties of proanthocyanidins (a class of phytonutrients found in red wine and grape seeds) appear to be much greater than both vitamin C and vitamin E, and also help protect both water soluble and fat soluble portions of cells.

which contain the statutory statement, on labels and in labeling the following product:

Vita-E Plus™ Dietary Supplement

I certify that the foregoing is complete and accurate, and that Shaklee Corporation has substantiation that the statements are truthful and not misleading.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chris Jensen', with a long horizontal flourish extending to the right.

Christopher Jensen, Ph.D.
Director, Health Sciences